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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
FAIRFIELD SENTRY LIMITED, et al.,)	Chapter 15 Case
Debtors in Foreign Proceedings.)	Case No: 10-13164 (SMB)
)	Jointly Administered
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,)	
)	
)	Plaintiffs,
-against-)	Adv. Pro. No. 10-03496
)	
THEODOOR GGC AMSTERDAM, et al.,)	Administratively
)	Consolidated
)	
Defendants.)	
)	

**DECLARATION OF DAVID J. MOLTON IN SUPPORT
OF THE LIQUIDATORS' OPPOSITION TO CERTAIN DEFENDANTS'
MOTION TO DISMISS ON GROUNDS OF *FORUM NON CONVENIENS***

I, David J. Molton, do hereby declare, under penalty of perjury under the laws of the United States of America, that the following is true and correct to the best of my knowledge and belief:

1. I am a member of the law firm of Brown Rudnick LLP, counsel for Kenneth Krys and Charlotte Caulfield, (together, the “Liquidators” or “Foreign Representatives”), in their capacities as the duly appointed Liquidators and Foreign Representatives of Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation), and Fairfield Lambda Limited (In Liquidation). I submit this Declaration in support of the Liquidators’ Opposition to Certain Defendants’ Motion to Dismiss on Grounds of *Forum Non Conveniens*.

2. As of March 8, 2011, 205 redeemer actions filed by the Liquidators were pending in this Court.

3. As of April 20, 2011, 211 redeemer actions filed by the Liquidators were pending in this Court.

4. As of September 16, 2011, 229 redeemer actions filed by the Liquidators were pending in this Court, seeking over \$5 billion in aggregate damages.

5. Attached as Exhibit A are appendices listing Defendants moving to dismiss on the grounds of *forum non conveniens* that the Liquidators allege, or that Movants contend, are organized under the laws of the British Virgin Islands. None of these Movants have asserted that they are doing business or have any commercial activities in the BVI.

Executed on April 6, 2017.

/s/ David J. Molton
DAVID J. MOLTON

Appendix A¹

	Case No.	Case Name	Moving Defendant Name
1.	Adv. Pro. 12-01264	<i>Fairfield Sentry Ltd. (In Liquidation), et al. v. Jared Trading Limited/BVI et al.</i>	Jared Trading Limited/BVI
2.	Adv. Pro. 11-01578	<i>Fairfield Sentry Ltd. (In Liquidation), et al. v. NYROY, et al.</i>	NYROY, Royal Bank of Canada*

Appendix A-1²

	Case No.	Case Name	Moving Defendant Name
1.	Adv. Pro. 10-04088	<i>Fairfield Sentry Ltd. (In Liquidation), et al. v. Credit Suisse (Luxembourg) SA, et al.</i>	Leu Performance Global Fund
2.	Adv. Pro. 10-04088	<i>Fairfield Sentry Ltd. (In Liquidation), et al. v. Credit Suisse (Luxembourg) SA, et al.</i>	Prima Global Fund

¹ The Movants included in this Appendix A are those that the Liquidators allege were organized under the laws of, and/or have registered addresses in, the BVI. The Liquidators allege that the Movant that is identified with a “*” is a corporate entity organized under the laws of the BVI, but do not allege that it has its registered address in the BVI.

² The Movants included in this Appendix A-1 are those that claim they are organized under the laws of the BVI, despite contrary allegations by the Liquidators.